

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD and  
SAMSUNG ELECTRONICS AMERICA, INC.,

*Defendants.*

Case No. 2:23-cv-00103-JRG-RSP

**JURY TRIAL DEMANDED**

**SAMSUNG’S NOTICE CONCERNING CO-PENDING VALIDITY  
CHALLENGES TO THE ASSERTED PATENTS**

Pursuant to this Court’s Standing Order Requiring Notice of Relevant Determinations from Related Proceedings, Samsung respectfully files this notice of recent events concerning pending challenges to the validity of the Asserted Patents before the United States Patent and Trademark Office (“USPTO”) and the Patent Trial and Appeal Board (“PTAB”).

On February 11, 2025, the USPTO issued an order granting a request for *ex parte* reexamination of U.S. Patent No. 9,198,117 and began *ex parte* reexamination proceedings as to the ’117 patent, including for all asserted claims 1, 6, 10, 12-13, and 16. *See* Ex. A.

On March 5, 2025, the PTAB heard oral argument for Samsung’s instituted *inter partes* review against U.S. Patent No. 9,615,192, including for all asserted claims 1 and 11. A Final Written Decision concerning the patentability of the ’192 patent is expected by May 2025. *See* IPR2024-00010, Paper 8.

On April 24, 2025, the PTAB is scheduled to hear oral argument for Samsung’s instituted *inter partes* review against U.S. Patent No. 8,406,733, including for all asserted claims 1, 7, and

19. A Final Written Decision concerning the patentability of the '733 patent is expected by July 2025. *See* IPR2024-00341, Paper 13.

Dated: March 17, 2025

Respectfully submitted,

By: /s/ Jonathan B. Bright

Ruffin B. Cordell

TX Bar No. 04820550

Michael J. McKeon

DC Bar No. 459780

mckeon@fr.com

Jared Hartzman

DC Bar No. 1034255

hartzman@fr.com

**Fish & Richardson P.C.**

1000 Maine Avenue, SW, Ste 1000

Washington, D.C. 20024

Telephone: (202) 783-5070

Facsimile: (202) 783-2331

Thad C. Kodish

GA Bar No. 427603

tkodish@fr.com

Benjamin K. Thompson

GA Bar No. 633211

bthompson@fr.com

Nicholas A. Gallo (*pro hac vice*)

GA Bar No. 546590

gallo@fr.com

Steffen C. Lake (*pro hac vice*)

GA Bar No. 512272

lake@fr.com

Sara C. Fish

sfish@fr.com

GA Bar No. 873853

Noah C. Graubart

GA Bar No. 141862

graubart@fr.com

Katherine H. Reardon

NY Bar No. 5196910

reardon@fr.com

**Fish & Richardson P.C.**

1180 Peachtree St. NE, Fl. 21

Atlanta, GA 30309  
Telephone: (404) 892-5005  
Facsimile: (404) 892-5002

Leonard E. Davis  
TX Bar No. 05521600  
ldavid@fr.com  
Andria Rae Crisler  
TX Bar No. 24093792  
crisler@fr.com  
Thomas H. Reger II  
Texas Bar No. 24032992  
reger@fr.com  
**Fish & Richardson P.C.**  
1717 Main Street, Suite 5000  
Dallas, TX 75201  
Telephone: (214) 747-5070  
Facsimile: (214) 747-2091

John-Paul R. Fryckman (*pro hac vice*)  
CA Bar No. 317591  
John W. Thornburgh  
CA Bar No. 154627  
thornburgh@fr.com  
**Fish & Richardson P.C.**  
12860 El Camino Real, Ste. 400  
San Diego, CA 92130  
Telephone: (858) 678-5070  
Facsimile: (858) 678-5099

Melissa R. Smith  
State Bar No. 24001351  
Melissa@gillamsmithlaw.com  
Harry L. Gillam, Jr.  
State Bar No. 07921800  
gil@gillamsmithlaw.com  
**Gillam & Smith, LLP**  
303 South Washington Avenue  
Marshall, Texas 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257

Andrew Thompson ("Tom") Gorham  
State Bar No. 24012715  
tom@gillamsmithlaw.com  
James Travis Underwood

State Bar No. 24102587  
travis@gillamsmithlaw.com  
**Gillam & Smith, LLP**  
102 N. College, Ste. 800  
Tyler, Texas 75702  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257

Grant Schmidt  
Texas Bar No. 24084579  
gschmidt@hilgersgraben.com  
Jon Hyland  
jhyland@hilgersgraben.com  
Texas Bar No. 24046131  
Theodore Kwong  
tkwong@hilgersgraben.com  
Texas Bar No. 4087871  
**Hilgers Graben PLLC**  
7859 Walnut Hill Lane, Suite 335  
Dallas, Texas 75230  
Telephone: 469-751-2819

Lance Lin Yang  
CA. Bar No. 260705  
Lanceyang@quinnemanuel.com  
Sean S. Pak  
CA Bar No. 219032  
seanpak@quinnemanuel.com  
**Quinn Emanuel Urquhart &  
Sullivan, LLP**  
50 California Street, 22nd Floor  
San Francisco, CA 94111  
Telephone: (415) 875-6600

*Attorneys for Defendants  
Samsung Electronics Co., LTD and  
Samsung Electronics America, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on March 17, 2025. As of this date, all counsel of record have consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A) and via electronic mail.

/s/ Jonathan B. Bright

Jonathan B. Bright